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May 17, 2004

Filed Electronically

Ms. Marlene H. Dortch
Secretary of the Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: *Hearing Aid-Compatibility Report (WT Docket No. 01-309)*

Dear Ms. Dortch:

Pursuant to the Commission's *Hearing Aid-Compatibility Report and Order*,¹ attached please find a Hearing Aid-Compatibility Report submitted on behalf of Inland Cellular Telephone Company ("Inland"), the general partner of Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership.

Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:



William J. Sill

Attachment

¹ Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16753 (2003).

HEARING AID-COMPATIBILITY STATUS REPORT

May 17, 2004

**Eastern Sub-RSA Limited Partnership
Licensee of:**

**WA5 (B2) Washington 5 - Kittitas RSA
Call Sign: KNKQ283**

and

**Washington RSA No. 8 Limited Partnership
Licensee of:**

**WA8 (B) Washington 8 - Whitman RSA
Call Sign: KNKN489**

**ID1 (B2) Idaho 1 - Boundary RSA
Call Sign: KNKQ400**

**ID2 (B2) Idaho 2 - Idaho RSA
Call Sign: KNKR305**

Inland Cellular Telephone Company ("Inland"), the general partner of Eastern Sub – RSA Limited Partnership and Washington RSA No. 8 Limited Partnership (collectively "the Partnerships"), hereby provides the Commission with the Hearing Aid-Compatibility Status Report ("Report"), as required by the Commission's *Hearing Aid-Compatible Report and Order*.¹ Inland is submitting this report, on behalf of the Partnerships, in order to provide the Commission with the current status of the Partnerships' efforts and progress toward compliance with the Commission's hearing aid-compatibility requirements. In preparing the instant Report, Inland followed the guidelines the Commission set forth in its *Hearing Aid-Compatible Report and Order*.²

¹ Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 01-309, *Report and Order*, 18 FCC Rcd 16753 (2003).

² *Id.* at ¶ 89.

**Licensee Name and Contact Information:
Eastern Sub-RSA Limited Partnership
Washington RSA No. 8 Limited Partnership**

c/o

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Licensee's Relationship to Equipment Manufacturers:

As small carriers, the Partnerships do not purchase a sufficient number of handsets to be allowed to buy directly from the handset manufacturers. Instead, the Partnerships must rely on 'middle-men' or third party vendors who purchase new handsets from manufacturers and then sell them to small carriers. The Partnerships regularly purchases handsets from the following third party vendors: Brightpoint, Cellstar, IDCOMM and Aerovoice. Currently, the Partnerships stock handset models from the following equipment manufacturers: Nokia, Kyocera, Motorola, LG and Audiovox.

The Partnerships' attenuated relationship with equipment manufacturers adversely impacts the Partnerships in several respects. First, it is difficult to obtain up-to-the-minute information concerning equipment manufacturers' planned offerings. Second, prior experience with E911 Phase II ALI equipped handsets has shown that this attenuated relationship results in the Partnerships receiving the newer more desirable handset models long after the larger CMRS carriers receive them.

Licensees Hearing Aid-Compatibility Efforts to Date:

Inland, on behalf of the Partnerships, has kept abreast, as best it can, with hearing aid-compatible handset offerings. As recently as last week Inland contacted the above mentioned third party vendors and requested the latest information related to the status of hearing aid-compatible handsets. As noted below, presently the Partnerships are able to provide new phone subscribers with a limited number of hearing aid-compatible handset models. In addition, Inland continues to refine the customer outreach efforts it will recommend the Partnerships adopt.

Phone Models which Manufacturers State are Hearing Aid-Compatibility Compliant and ANSI C63.19 Rating:

Based on Inland's efforts to gather equipment information from its third party vendors, Inland understands that Kyocera has at least two handsets which are hearing aid-compatibility compliant:

Model #: ANSI C63.19

KX414	No standardized testing method currently available to determine compliance.
KE424	No standardized testing method currently available to determine compliance.

Phone Models that Manufacturers State are Compatible with Hearing Aids:

Based on Inland's efforts to gather equipment information from its third party vendors, Inland understands that Kyocera offers at least two models which it states are hearing aid-compatible. In addition, Inland has learned that Motorola offers handsets with telecoils installed in the speaker so that these handsets, according to Motorola, will be compatible with many hearing aids that are equipped with their own telecoils.³

Retail Availability of Compliant Phones:

Out of the twenty-two handset models the Partnerships presently offer,⁴ three handset models are hearing aid-compatibility compliant. Inland and the Partnerships currently offer the Kyocera KX414. This hearing aid-compatibility compliant handset represents 9% of the total number of handset models currently purchased by the Partnerships' subscribers. In addition, the Partnerships' March 2004 sales numbers reflect that two of its top four selling handset models have integrated telecoils (Motorola V120 and the Motorola V60) which Motorola states render them compatible with telecoil equipped hearing aids.

Total Number of Compliant Phones Offered:

The Partnerships calculate that 43% of the phones provided to new subscribers are the Kyocera hearing aid-compatibility compliant phones and the Motorola telecoil equipped phones.

Total Number of Non-Compliant Phones Offered:

The remaining twenty-one handset models offered by the Partnerships are not hearing aid-compatibility compliant.

Information Regarding Differences in Handset Offerings Among Regions in Service Areas (For Service Providers Only):

The Partnerships are small carriers with four systems located in two adjacent states. Thus, while the Partnerships have not noticed any discrepancies in the handset offerings between the four systems, the Partnerships do not feel that the systems are sufficiently numerous or distant from one another such that a meaningful response can be provided to this question.

Efforts to Incorporate Hearing Aid-Compatibility into Newer Models:

As noted above, Inland understands that certain manufacturers, such as Motorola, offer handsets with telecoils in the speaker to allow for coupling with hearing aid telecoils making the handsets compatible with these hearing aids.

³ For the purposes of the Hearing Aid-Compatibility Status Report, the Partnerships are considering both the Kyocera and the Motorola models identified below as being 'hearing aid-compatible.'

⁴ The Partnerships maintain inventories with twenty-two handset models currently in stock, but are in the process of discontinuing twelve models. Therefore, in the near future, the Partnerships will offer ten handset models.

Activities Related to ANSI C63.19 or other Standards of Work:

Inland and the Partnerships will continue to keep abreast of developments in hearing aid-compatible handsets through third party vendors, consultation with its counsel, and interfacing with industry organizations of which Inland is a member.

Ongoing Efforts for Interoperability Testing with Hearing Aids:

Due to their status as small carriers, the Partnerships are reliant upon handset manufacturers and industry standards groups to work towards a standard for interoperability testing as well as to conduct such tests.

Product Labeling Information:

The Partnerships are able to provide their subscribers with new handsets through their retail cellular stores and through third party agents that sell their products.⁵ The Partnerships understand and will comply with the Commission's requirement that service providers ensure that information concerning hearing aid-compatible handsets, and more particularly a handset's U-Rating, is made visible to their subscribers.

Outreach Efforts

As hearing aid-compatible handsets become available, the Partnerships intend to do the following to educate both their potential subscribers and their current subscribers on the hearing aid-compatible phones being offered:

- Provide potential subscribers and current subscribers with informational materials at the Partnerships' retail stores identifying compliant handsets, and directing these subscribers to ask retail store personnel for more information;
- Train retail employees to identify and provide information regarding compliant handsets; and
- Make hearing aid-compatible related information available on Inland Cellular Telephone's web site, calling attention to the hearing aid-compatible handsets offered, their capabilities and other details regarding the compliant handsets.

⁵ The Partnerships' agents sell both Partnership provided handsets and handsets that the agents procure from other sources. In addition, Tracfone is a pre-paid cellular reseller that acquires and sells its own handsets. Tracfone's handsets are branded as Tracfone handsets rather than as the Partnerships or Inlands' handsets. Thus, the Partnerships are not able to monitor nor control, either the handsets its agents acquire on their own or Tracfone's self-branded handsets.